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March 19, 2018

VIA ECF

Honorable Brian M. Cogan
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Singh et al. v. Sunn Enterprise Group, LLC
Case No.: 17-CV-1387 (BMC) (SMG)

Dear Judge Cogan:

This firm represents Defendants in the above-captioned matter. We write to respectfully:

1. Request a one-week extension to obtain a bond in accordance with Court's March 12, 2018 order; and
2. Request permission to hold the value of the bond in my escrow account until this case is completed.

As the Court will recall, on March 12, 2018, the Court conditionally granted Defendants' motion to vacate the entry of a default if Defendants, by March 19, 2018, (1) paid \$1,000 in attorneys' fees to Plaintiffs' counsel; and (2) obtained a \$35,000 bond. Defendants have made the \$1,000 payment to Plaintiffs' counsel. However, Defendants have limited liquidity right now and, as a result, their bond application was rejected today. Defendants will now apply to other bond companies with the hope of obtaining the bond, which will take a few extra days.

Separately, I was advised by the bond company that Defendants could put up collateral for the full amount of the bond, which is \$35,000, and keep the collateral in my firm's escrow account. Defendants are now attempting to obtain the \$35,000 in order to obtain the bond. However, if Defendants are able to obtain the full \$35,000, because the bond company charges interest, we respectfully request that the Court permit my firm to instead hold the \$35,000 collateral in its escrow account in lieu of a bond.

Thank you for your attention to this matter.

Respectfully Submitted,

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Michael Taubenfeld (MT-4640)